

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

MISSISSIPPI ASSOCIATION OF HEALTH PLANS, INC.

PLAINTIFF

V.

CAUSE NO. 3:24-cv-379-HTW-LGI

MIKE CHANEY, IN HIS OFFICIAL  
CAPACITY AS COMMISSIONER OF  
INSURANCE OF MISSISSIPPI

DEFENDANT

DECLARATION OF JON ANDREW MADDOX

1. My name is Jon Andrew Maddox. I am over 21 years of age and am competent to make this declaration. I serve as the Executive Director of the Mississippi Association of Health Plans, Inc., a Mississippi non-profit corporation in good standing ("MAHP"). This Declaration is given based on my own personal knowledge and upon information obtained from the records of MAHP. I am authorized by MAHP to make this declaration.

2. MAHP was formed and incorporated in Mississippi in 1995. MAHP is an association that includes nine health insurance companies licensed by the Mississippi Insurance Department to sell health insurance in Mississippi and who are issuers and/or administrators of health benefit plans as defined in Miss. Code Ann. § 83-63-3 and/or accident and sickness insurance policies as defined in Miss. Code Ann. § 83-9-1.

3. Membership in MAHP is voluntary. It is governed by its Board of Directors made up of health benefit plans who are members of MAHP, who are selected by the members of MAHP. MAHP is financed by its members.

4. MAHP's mission is to champion high-quality, affordable and accessible health care and to work collaboratively with and for its members to address common challenges in the health



benefits space. MAHP's objectives on behalf of its members include coordinating state legislative activities pertaining to health benefits, working with state and federal agencies which regulate health benefits entities to promote and foster appropriate development and operation of health benefit programs, and to protect and strengthen the role of the health benefits industry in national healthcare.

5. MAHP's Board of Directors made the determination that House Bill 1489, enacted during the 2024 Regular Session of the Mississippi Legislature ("House Bill 1489" or the "Bill"), will impair the constitutional rights of some or all of its members and subject them to irreparable harm likely to be redressed by the requested declaratory judgment and injunction, and determined to pursue this litigation on behalf of its members.

6. At this time, I have nothing further to say.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the law of the United States of America that the above is true and correct to the best of my knowledge and belief.

Dated: July 17, 2024.

A handwritten signature in black ink, appearing to read 'Jon Maddox', is written over a horizontal line.

Jon Andrew Maddox, Executive Director  
Mississippi Association of Health Plans, Inc.